

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

**This document relates to:**

*County of Trumbull, Ohio v. Purdue Pharma,  
L.P. et al.*, Case No. 18-op-45079;

*The County of Lake, Ohio v. Purdue  
Pharma L.P., et al.*,  
Case No. 18-op-45032

**MDL No. 2804**

**Case No. 1:17-md-2804**

**Judge Dan Aaron Polster**

**PLAINTIFFS' MOTION FOR LEAVE TO  
FILE EXHIBITS UNDER SEAL**

Pursuant to Local Rule 5.2, the Case Track Three Plaintiffs, Lake County and Trumbull County, Ohio, (collectively, "Plaintiffs") seek leave to file Exhibits A and B to Plaintiffs' Motion for Leave to File Amended Complaints under seal.

Local Rule 5.2 states: "No document will be accepted for filing under seal unless a statute, court rule, or prior court order authorizes the filing of sealed documents." Loc. R. 5.2.

Plaintiffs' have attached as Exhibit A and B to their Motion for Leave to File Amended Complaints their proposed Supplemental and Amended Allegations to be Added to Short Form for Supplementing Complaint and Amending Defendants and Jury Demand ("Supplemental and Amended Allegations") in the following cases: *The County of Trumbull, Ohio v. Purdue Pharma L.P., et al.*, Case No. 18-op-45079; *The County of Lake, Ohio v. Purdue Pharma L.P., et al.*, Case No. 18-op-45032.

Plaintiffs' Supplemental and Amended Allegations contain information that has been subject to Protective and Confidentiality Orders, including Case Management Order No. 2 and the amendment thereto (Docket #s 441 & 1357). This information is subject to this Court's Order

Amending Procedures Regarding Redactions and Filing of Briefs Under Seal (Docket # 1813). Plaintiffs do not believe that the information warrants remaining under seal, but seek to comply with all applicable Orders concerning information that has been marked or designated as confidential.

Plaintiffs respectfully request to proceed in this manner so there are no inadvertent disclosures of information subject to Protective Orders and to comply with this Court's orders.

WHEREFORE, Plaintiffs respectfully request the Honorable Court to grant Plaintiffs' Motion for Leave to File their Exhibits Under Seal and to direct Defendants to indicate within three (3) business days whether they will assert any redactions.

Dated: May 15, 2020

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15<sup>th</sup> day of May, 2020, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF System.

/s/Pete Weinberger

Peter H. Weinberger (0022076)

*Plaintiffs' Liaison Counsel*